

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

DISH NETWORK L.L.C.,

Plaintiff,

v.

DOES 1-5, individually and together
d/b/a Easybox IPTV,

Defendants.

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Civil Action No. 4:19-cv-2994

**PLAINTIFF DISH NETWORK L.L.C.'S MOTION FOR LEAVE TO CONDUCT
EXPEDITED DISCOVERY AND ISSUANCE OF LETTERS OF REQUEST**

Plaintiff DISH Network L.L.C. ("DISH") respectfully moves the Court for leave to take limited discovery prior to the Federal Rule of Civil Procedure 26(f) conference and to issue three letters of request to Global Layer B.V. and WorldStream B.V. of the Netherlands and OVH Hosting, Inc. of Canada, for the purpose of identifying Defendant Does 1-5. DISH's motion is based upon the concurrently filed memorandum of points and authorities, the supporting declarations from Bradford Hammer, Gregory Duval, and Stephen Ferguson, and any other evidence or argument the Court may consider.

Dated: August 12, 2019

Respectfully submitted,

HAGAN NOLL & BOYLE LLC

By: /s/ Stephen M. Ferguson

Stephen M. Ferguson (attorney-in-charge)

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